

Horowitz, Andrew

From: Fox, Bruce
Sent: Saturday, January 30, 2021 4:10 PM
To: OHSDdb_Vascura_Ch
Cc: Leigh Anne Newcomer; Allison Moran; Joshua Adam Engel; Horowitz, Andrew; Genard, Allison; 'Corl, Christina'; Chen, Qiwei
Subject: RE: Huang v. OSU et al 2:10-cv-1976

Judge Vascura,

This is the first time we have heard that there is a pending discovery dispute requiring the Court's immediate attention at the close of discovery. We do not believe that counsel has remotely satisfied her obligation to meet and confer. Only yesterday afternoon did counsel send us a letter identifying multiple areas of further inquiry, many of which could have in fact been made months ago. We have therefore had no opportunity to investigate--let alone meaningfully meet and confer on--the multiple areas of inquiry Ms. Corl has just identified. Once we have had the opportunity to adequately investigate and confer with our client, and then respond to counsel's eleventh hour requests, there then may or may not be issues ripe for consideration by the Court. We are hopeful that once we are able meaningfully meet and confer, it will not be necessary.

Thank you very much for your attention to this matter.



Bruce C. Fox

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From: Corl, Christina <CCorl@plunkettcooney.com>
Sent: Friday, January 29, 2021 8:13 PM
To: OHSDdb_Vascura_Ch <Vascura_Chambers@ohsd.uscourts.gov>; Chen, Qiwei <qiwei.chen@obermayer.com>
Cc: Leigh Anne Newcomer <Leigh_Anne_Newcomer@ohsd.uscourts.gov>; Allison Moran <Allison_Moran@ohsd.uscourts.gov>; Fox, Bruce <bruce.fox@obermayer.com>; Joshua Adam Engel <engel@engelandmartin.com>; Horowitz, Andrew <Andrew.Horowitz@obermayer.com>; Genard, Allison <allison.genard@obermayer.com>
Subject: Re: Huang v. OSU et al 2:10-cv-1976

Judge Vascura, please be advised that the parties have a discovery dispute which requires the Court's attention. We are bringing this to the Court's attention prior to the close of discovery. Thank you, as always, for your attention to this matter.



Christina L. Corl

Plunkett Cooney
Attorneys & Counselors at Law
T 614.629.3018 C 614.309.9212

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On Nov 10, 2020, at 12:51 PM, Corl, Christina <CCorl@plunkettcooney.com> wrote:

Ms. Matthews, attached are the Plaintiff's supplemental interrogatory responses.

At issue are the responses to interrogatories 26-32 and 34-39.

Thank you again.

<image001.jpg>

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From: OHSDdb_Vascura_Ch <Vascura_Chambers@ohsd.uscourts.gov>
Sent: Tuesday, November 10, 2020 12:45 PM
To: Corl, Christina <CCorl@plunkettcooney.com>; OHSDdb_Vascura_Ch <Vascura_Chambers@ohsd.uscourts.gov>; Chen, Qiwei <qiwei.chen@obermayer.com>
Cc: Leigh Anne Newcomer <Leigh_Anne_Newcomer@ohsd.uscourts.gov>; Allison Moran <Allison_Moran@ohsd.uscourts.gov>; bruce.fox_obermayer.com <bruce.fox@obermayer.com>; 'Joshua Adam Engel' <engel@engelandmartin.com>; Horowitz, Andrew <Andrew.Horowitz@obermayer.com>; Genard, Allison <allison.genard@obermayer.com>
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[EXTERNAL]

Thank you, counsel. We will notice this conference for 11am on November 19, 2020. In advance of the conference, it would also be helpful if you could provide copies of the particular interrogatories and answers that are in dispute.

Regards,

<image002.png>

Jacqueline Matthews
Law Clerk
The Honorable Chelsey M. Vascura
United States District Court
Southern District of Ohio
Jacqueline_Matthews@ohsd.uscourts.gov
(614) 719-3412

From: Corl, Christina <CCorl@plunkettcooney.com>
Sent: Tuesday, November 10, 2020 12:04 PM
To: OHSDdb_Vascura_Ch <Vascura_Chambers@ohsd.uscourts.gov>; Chen, Qiwei <qiwei.chen@obermayer.com>
Cc: Leigh Anne Newcomer <Leigh_Anne_Newcomer@ohsd.uscourts.gov>; Allison Moran <Allison_Moran@ohsd.uscourts.gov>; bruce.fox_obermayer.com <bruce.fox@obermayer.com>; 'Joshua Adam Engel' <engel@engelandmartin.com>; Horowitz, Andrew <Andrew.Horowitz@obermayer.com>; Genard, Allison <allison.genard@obermayer.com>
Subject: RE: Huang v. OSU et al 2:10-cv-1976

CAUTION - EXTERNAL:

Ms. Matthews, the parties have conferred on a date/time.

Would November 19 before noon work for the Court?

<image001.jpg>

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From: OHSDdb_Vascura_Ch <Vascura_Chambers@ohsd.uscourts.gov>
Sent: Tuesday, November 10, 2020 10:52 AM
To: Corl, Christina <CCorl@plunkettcooney.com>; Chen, Qiwei <qiwei.chen@obermayer.com>
Cc: OHSDdb_Vascura_Ch <Vascura_Chambers@ohsd.uscourts.gov>; Leigh Anne Newcomer <Leigh_Anne_Newcomer@ohsd.uscourts.gov>; Allison Moran <Allison_Moran@ohsd.uscourts.gov>; bruce.fox_obermayer.com <bruce.fox@obermayer.com>; 'Joshua Adam Engel' <engel@engelandmartin.com>; Horowitz, Andrew <Andrew.Horowitz@obermayer.com>; Genard, Allison <allison.genard@obermayer.com>
Subject: RE: Huang v. OSU et al 2:10-cv-1976

[EXTERNAL]

Counsel,

Now that Judge Graham has overruled Plaintiff's objections to Judge Vascura's denial of Plaintiff's Motion for Recusal, Judge Vascura would like to re-set this matter for a discovery conference. Please confer and provide a few dates and times during the week of November 16 in which all parties are available. Please also advise us if the parties have resolved any of the items noted in their October 28 submissions in the interim.

Regards,

<image002.png>

Jacqueline Matthews
Law Clerk
The Honorable Chelsey M. Vascura
United States District Court
Southern District of Ohio
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From: Corl, Christina <CCorl@plunkettcooney.com>
Sent: Thursday, October 29, 2020 10:11 AM
To: Chen, Qiwei <qiwei.chen@obermayer.com>; Chelsey Vascura <Chelsey_Vascura@ohsd.uscourts.gov>
Cc: OHSDdb_Vascura_Ch <Vascura_Chambers@ohsd.uscourts.gov>; Jacqueline Matthews <Jacqueline_Matthews@ohsd.uscourts.gov>; Leigh Anne Newcomer <Leigh_Anne_Newcomer@ohsd.uscourts.gov>; Allison Moran <Allison_Moran@ohsd.uscourts.gov>; bruce.fox_obermayer.com <bruce.fox@obermayer.com>; 'Joshua Adam Engel' <engel@engelandmartin.com>; Horowitz, Andrew <Andrew.Horowitz@obermayer.com>; Genard, Allison <allison.genard@obermayer.com>
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CAUTION - EXTERNAL:

Judge Vascura, in the interest not wasting the Court's time, with respect to number 3 on Plaintiff's summary to the Court related to redaction of student names in investigation materials, Defendants have already agreed to provide the unredacted documents. I'm not sure why that was included in the summary. Thanks.

<image001.jpg>

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From: Chen, Qiwei <qiwei.chen@obermayer.com>
Sent: Wednesday, October 28, 2020 11:33 PM
To: 'Chelsey Vascura' <Chelsey_Vascura@ohsd.uscourts.gov>
Cc: OHSDdb_Vascura_Ch <Vascura_Chambers@ohsd.uscourts.gov>; Jacqueline Matthews <Jacqueline_Matthews@ohsd.uscourts.gov>; Leigh Anne Newcomer <Leigh_Anne_Newcomer@ohsd.uscourts.gov>; 'Allison_Moran@ohsd.uscourts.gov'

<Allison_Moran@ohsd.uscourts.gov>; Corl, Christina <CCorl@plunkettcooney.com>; Fox, Bruce
<bruce.fox@obermayer.com>; 'Joshua Adam Engel' <engel@engelandmartin.com>; Horowitz, Andrew
<Andrew.Horowitz@obermayer.com>; Genard, Allison <allison.genard@obermayer.com>
Subject: Huang v. OSU et al 2:10-cv-1976

[EXTERNAL]

Dear Judge Vascura,

Please find attached Plaintiff's letters and exhibits. Thank you for your time and attention to this matter.

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<image004.jpg>

<image005.jpg>

<image006.jpg>

Qiwei Chen, Esq.

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& Hippel LLP**

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<Huang First Supplemental Responses to Discovery 1 4812-0098-4270.PDF>